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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

MATTHEW WADE BEASLEY; BEASLEY
LAW GROUP PC; JEFFREY J. JUDD;
CHRISTOPHER R. HUMPHRIES; J&J
CONSULTING SERVICES, INC., an Alaska
Corporation; J&J CONSULTING
SERVICES, INC., a Nevada Corporation; J
AND J PURCHASING LLC; SHANE M.
JAGER; JASON M. JONGEWARD;
DENNY SEYBERT; and ROLAND
TANNER;

Defendants,

THE JUDD IRREVOCABLE ; PAJ
CONSULTING INC; BJ HOLDINGS LLC;
STIRLING CONSULTING, L.L.C.; CJ
INVESTMENTS, LLC; JL2
INVESTMENTS, LLC; ROCKING HORSE
PROPERTIES, LLC; TRIPLE THREAT
BASKETBALL, LLC; ACAC LLC;
ANTHONY MICHAEL ALBERTO, JR.; and
MONTY CREW LLC;

Relief Defendants.

Case No. 2:22-cv-0612-JCM-EJY

**RESPONSE TO ACCOUNTING
ORDERED PURSUANT TO
APRIL 13, 2022 TEMPORARY
RESTRAINING ORDER**

1 The Court’s April 13, 2022 *Temporary Restraining Order and Orders (1) Freezing*
2 *Assets; (2) Requiring Accountings; (3) Prohibiting the Destruction of Documents; and*
3 *(4) Granting Expedited Discovery; and (5) Order to Show Cause re Preliminary Injunction* (the
4 “TRO Order”), ordered Defendant Jeffrey J. Judd (“Judd”) to “prepare and deliver to the
5 Commission a detailed and complete schedule of all of their personal assets, including all real
6 and personal property exceeding \$5,000 in value, and all bank, securities, and other accounts
7 identified by institution, branch address and account number. The accounting shall include a
8 description of the sources of all such assets.” TRO Order ¶ X. The TRO Order further ordered
9 that: “After completion of the accounting, each of the Defendants shall produce to the
10 Commission, at a time agreeable to the Commission, all books, records and other documents
11 supporting or underlying their accounting.” *Id.*

12 The Commission was aware, and evidence presented to the Court confirms, that the
13 Federal Bureau of Investigation conducted a search of Judd’s home on March 3, 2022, and that
14 attorneys for Judd were in communication with Assistant U.S. Attorneys with the United States
15 Department of Justice in connection with an investigation of alleged criminal activity. *See*
16 Declaration of Joni Ostler (Dkt. 2-5), ¶ 8; Ex. 3.

17 Because the TRO Order requires Judd to “prepare and deliver” to the Commission and
18 this Court a “detailed and complete schedule” of all of his personal assets, including “a
19 description of the sources of all such assets,” the information is testimonial in nature. Judd,
20 therefore, asserts the protections of the Fifth Amendment privilege against self-incrimination.
21 U.S. CONST. amend. V.

1 DATED this 18th day of April, 2022.

2 /s/ Kevin N. Anderson

3 KEVIN N. ANDERSON, ESQ.

4 Nevada State Bar No. 4512

5 TREVOR R. WAITE, ESQ.

6 Nevada State Bar No. 13779

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13 Attorneys for Jeffrey A. Judd

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on the 18th day of April, 2022, I caused a copy of the foregoing to be served via e-mail or the United States Mail, with first-class postage prepaid, on the following as indicated as follows:

Via E-mail

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6 *Counsel for Defendant Denny Seybert*

7 **Via U.S. Mail**

8 Beasley Law Group, PC,
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10 2190 East Mesquite Avenue
11 Pahrump, Nevada 89060
12 *Defendant*

13 J&J Consulting Services, Inc., an Alaska corporation
14 c/o Northwest Registered Agent, Inc., Registered Agent
15 125 North Willow Street, Suite B
16 Kenai, Alaska 99611
17 *Defendant*

18 J&J Consulting Services, Inc., a Nevada corporation
19 J and J Purchasing LLC
20 c/o Gregory E. Garman, Esq.
21 ggarman@gtg.legal
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*Counsel for Peter Kravitz, Chief Restructuring Officer of
Defendants J& Consulting Services, Inc., a Nevada
corporation & J and J Purchasing LLC*

Jason M. Jongeward &
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Washington, Utah 84780
Defendant

Roland Tanner
1168 Sparta Crest Street
Henderson, Nevada 89052
Defendant

1 PAJ Consulting, Inc.
2 c/o Matthew Beasley, Reg. Agent
3 1872 Shy Albatross Avenue
4 N. Las Vegas, NV 89084
5 *Relief Defendant*

6 BJ Holdings, LLC
7 c/o Matthew Beasley, Reg. Agent
8 5475 Ruffian Road
9 Las Vegas, NV 89149
10 *Relief Defendant*

11 Stirling Consulting, L.L.C.
12 c/o Shane Jager, Reg. Agent
13 6785 S. Eastern Ave., Unit 8
14 Las Vegas, NV, 89119
15 *Relief Defendant*

16 CJ Investments, LLC
17 c/o Jessica Humphries, Reg. Agent
18 726 Glowing Horizon St.
19 Henderson, NV 89052-8743
20 *Relief Defendant*

21 JL2 Investments, LLC
22 c/o Jason M. Jongeward, Reg. Agent
23 6311 Crestview Ln.
24 Cheney, WA 99004-5109
25 *Defendant*

Rocking Horse Properties, LLC
c/o Smith & Shapiro, PLLC, Reg. Agent
3333 E. Serene Ave., Suite 130
Henderson, Nevada 89074
Relief Defendant

Triple Threat Basketball, LLC
c/o BD & Associates CPAS PLLC, Reg. Agent
Attn. Brent Barlow
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Henderson, NV 89012
Relief Defendant

1 ACAC, LLC
2 c/o Holley Driggs, Ltd., Reg. Agent
3 Attn. Ronald Thompson
4 400 South Fourth Street Third Fl.
5 Las Vegas, NN 89101
6 *Relief Defendant*

7 Anthony Michael Alberto, Jr.
8 12018 Portamento Court
9 Las Vegas, Nevada 89138-0610
10 *Relief Defendant*

11 Monty Crew LLC
12 c/o Evans & Associates, Former Reg. Agent
13 Attn. Shannon L. Evans
14 2400 S Cimarron Rd., Ste. 140
15 Las Vegas, NV 89117
16 2648 South Mole Street
17 Philadelphia, PA 19145-4608
18 *Relief Defendant*

19 DATED this 18th day of April, 2022.

20 /s/ Kevin N. Anderson
21 KEVIN N. ANDERSON, ESQ.
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23
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